

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	Case No. 14-24276CMB
Jacqueline Y. Wade-Rowe)	Chapter13
)	
Debtor(s))	
)	Doc # <u>122</u>
Ronda J. Winnecour, Chapter 13 Trustee)	
Movant(s))	
Vs.)	
Jacqueline Y. Wade-Rowe)	
)	
Respondent(s))	

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW, Lawrence Willis & Willis Associates, for the Debtor, reports, as follows:

1. It is Admitted that this case was filed on October 24, 2014.
2. It is Admitted that Sixty months have elapsed since the filing of the case.
3. It is Admitted that the plan base has not been met.
4. Debtor is in the process of submitting the funds of \$924.00 as needed to complete the plan and will have paid in prior to hearing.
5. Debtor is aware of the \$2,105.00 inadvertently paid to the Urban League of Pittsburgh.
6. Debtor is aware of that the Urban League of Pittsburgh received payments of \$2,015.00.
7. Debtor is aware of that, no refund has been received. Urban League of Pittsburgh.
8. Debtor is in the process of submitting the funds of \$924.00 as needed to complete the plan.

WHEREFORE, the Counsel reports to the Honorable Court in the above reference case.

Respectfully Submitted,

11/21/19

/ s/ Lawrence Willis
Lawrence W. Willis

Willis & Associates
201 Penn Center Blvd
Suite 310
Pittsburgh, PA 15235
412-235-1721
Email: ecf@westernpabankruptcy.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	Case No. 14-24276CMB
Jacqueline Y. Wade-Rowe)	Chapter13
)	
Debtor(s))	
)	Doc # _____
Ronda J. Winnecour, Chapter 13 Trustee)	
Movant(s))	
Vs.)	
Jacqueline Y. Wade-Rowe)	
)	
Respondent(s))	

CERTIFICATE OF SERVICE

I hereby certify that on the date shown below, I served a true and correct copy of the Response to the Motion with attached proposed Order of Court upon the following, by regular United States mail, postage prepaid:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Jacqueline Y. Wade-Rowe
2001 Delaware Avenue
Pittsburgh PA 15218

Office of the Chapter 13 Trustee
US Steel Tower – Suite 3250
600 Grant Street
Pittsburgh, PA 15219

Lawrence Willis, Esquire
201 Penn Center Blvd Suite 310
Pittsburgh PA 15235

11-21-19

/ s/ Lawrence Willis
Lawrence Willis, Esquire
201 Penn Center Blvd Suite 310
Pittsburgh PA 15235